

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

D. KRESS, *individually and on behalf of those
similarly situated,*

Plaintiff,

v.

FULTON BANK, N.A.,

Defendant.

No: 1:19-cv-18985-CDJ-MJS

**NAMED PLAINTIFF'S UNOPPOSED MOTION FOR FINAL APPROVAL OF CLASS
AND COLLECTIVE SETTLEMENT, ATTORNEY'S FEES AND COSTS, SERVICE
AWARDS, AND SETTLEMENT ADMINISTRATION FEES**

For the reasons set forth in the attached Memorandum of Law in Support of this Motion, Plaintiffs respectfully request this Court enter an Order:

1. Granting final approval of the Parties' Settlement with respect to the proposed Fed. R. Civ. P. 23 classes alleging claims under New Jersey law;
2. Granting final approval of the Parties' Settlement with respect to the FLSA collective action;
3. Approving Epiq Class Action & Claims Solutions, Inc.'s requested fees;
4. Approving Legal Services of New Jersey as the *cy pres* recipient.
5. Approving Class Counsel's request for attorneys' fees in the amount of \$333,333.33 (one-third of the Maximum Settlement Amount);
6. Approving Class Counsel's request for reimbursement of litigation expenses in the amount of 400.00;
7. Approving Named Plaintiff Kress's and Opt-in Plaintiff Stephen's requests for Service Payments, totaling \$5,500.
8. An Order dismissing the matter on the merits, with prejudice, in accordance with the

terms of the Settlement Agreement and Release.

Respectfully submitted,

/s/ Matthew Miller

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